

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Christopher James Hoef

Case: 2:21-mj-30033

Assigned To : Unassigned

Assign. Date : 1/19/2021

Case No.

Description: RE: CHRISTOPHER  
JAMES HOEF (EOB)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Dec. 3, 2020 and Jan. 15-18, 2021 in the county of Oakland in the  
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*18 USC § 2422(b)  
18 USC § 1470Online enticement of a minor to engage in sexual activity  
Transfer of obscene matter to a minorThis criminal complaint is based on these facts:  
see attached affidavit.☒ Continued on the attached sheet.Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: January 19, 2021City and state: Detroit, Michigan*Complainant's signature*

Eli Bowers, Special Agent (FBI)

*Printed name and title**Judge's signature*

Hon. David R. Grand, United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR  
COMPLAINT AND ARREST WARRANT**

I, Eli Bowers, having been first duly sworn, do hereby depose and state as follows:

**I. INTRODUCTION**

1. I have been employed as a Special Agent of the FBI since 2015, and am currently assigned to the FBI Detroit Division. Prior to being employed by the FBI, I was employed as a Park Ranger with the National Park Service for approximately six years, where my duties included the enforcement and investigation of federal crimes. While employed by the FBI, I have investigated numerous federal criminal violations related to child exploitation and child pornography. I have received training in investigating internet fraud, computer intrusions, and matters involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy, post Academy training, and everyday work related to conducting these types of investigations.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **CHRISTOPHER JAMES HOEF** (date of birth \*\*/\*\*/1994) for violating 18 U.S.C. § 2422(b) online enticement of a minor to engage in sexual activity and 18 U.S.C. § 1470 Transfer of Obscene Matter to a Minor.

3. The statements contained in this affidavit are based in part on written reports from other law enforcement agents, independent investigation and analysis by law enforcement officers/analysts, and my experience, training and background as a Special Agent (SA) with the FBI. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to law enforcement concerning this investigation. The facts set forth establish probable cause that **HOEF** has violated Title 18 U.S.C. § 2422(b) and 18 U.S.C. § 1470.

## II. PROBABLE CAUSE

4. On or about November 9, 2020 an FBI online covert employee (OCE), purporting to be a 14 year old girl, started a thread on a rape fantasy website, title Bored Big Sister, along with a KIK username lilemily313. Rapey.su is an online forum designed to link together individuals interested in rape; this includes both getting raped as well as being a rapist. KIK is a mobile phone application that allows user to send text and multimedia messages using the internet.

5. On December 3, 2020, the OCE received a message from KIK user SaltyTripod. Based on the conversations, SaltyTripod indicated that he had a sexual interest in rape fantasies, and knew that the OCE identified themselves as a 14 year old. SaltyTripod indicated a desire to engage in roleplay and rape with the

OCE, who specifically indicated her age.

6. The OCE clearly identified as 14 years old in the website profile, as well as identifying themselves as 14 in their chat. Additionally, the OCE discusses having to schedule the sexual encounter around her mom's schedule. This furthers SaltyTripod's knowledge of her purported age, because an adult would not typically have to discuss planning an encounter around her mom's schedule. The conversation is clearly sexually explicit in nature, as SaltyTripod talks to the OCE about "f\*\*\*\*\* your (The OCE's) throat"<sup>1</sup> and other rape scenarios.

7. The user SaltyTripod continued attempting to set up a meeting for a sexual encounter with the OCE. Additionally, after showing knowledge of the OCE's purported age, SaltyTripod sent an explicit video of a male masturbating. The following are some examples these chats depicting SaltyTripod's intent to meet for sex, as well as sending an explicit video to the OCE:

**SaltyTripod:** Any plans today? / Send address and We can have fun tonight  
/ I'm free tonight / Come on. This broad that is sucking my c\*\*\* right now  
isn't doing it for me. Let me rape you instead  
...

**SaltyTripod:** Want to come over tonight? / It'll be fun I promise

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<sup>1</sup> Throughout this affidavit, asterisk are used to redact either explicit material or personal information. The defendant's actual texts contain the entire word.

...

**SaltyTripod:** Was thinking about filling you up with my c\*\* after abusing your body any way I want / You really need me to send me your address

...

**SaltyTripod:** Still Interested? / I can pick you up later if you'd like. Just let me know / If you need an escape for Christmas Eve or Christmas let me know / {Video appears to be of male masturbating}

8. On December 8, 2020 an administrative subpoena was served to the chat application, KIK. KIK returned subscriber information and IP address information for the user, SaltyTripod. The following is a summary of the information received:

First Name: C  
Last Name: H  
Earliest Provided IP (11/10/2020): 166.170.21.77  
Latest Provided IP (12/09/2020): **68.48.187.246**

9. On December 22, 2020, an administrative subpoena was served to COMCAST, the internet service provider who manages IP address **68.48.187.246**. On December 23, 2020, comcast returned the following information for the user who was assigned the referenced IP address on the date of request:

Subscriber Name: CHRISTOPHER HOEF  
Service Address: \*\*\*\*\*, HAZEL PARK, MI  
Telephone #: xxx-2xx-5xxx

10. Christopher HOEF is a 26 year old man who resides in the Eastern District of Michigan. In addition to the IP Address information, HOEF has the same initials that the user, SaltyTripod, identified in their profile. Moreover, on one of the chats with the OCE, SaltyTripod discussed having a Harley Davidson motorcycle. According to the Michigan Secretary of State, Christopher HOEF also has a Harley Davidson motorcycle registered in his name. HOEF does not have a criminal history.

**Attempted meet for sexual encounter with purported 14 year old**

11. From January 15-18, 2021, HOEF made arrangements via the KIK application to meet in person with the OCE, to engage in a sexual encounter. They discussed meeting at a local business so the purported 14 year old could be picked up without being seen at her house. Additionally, the purported 14 year old girl told HOEF she didn't have school that day so she had time to meet, but had to wait until her mom left before she could leave her house. On Saturday, January 16, 2021, HOEF confirmed with the OCE that she was on birth control prior to their meeting on Monday.

12. Throughout the weekend of chatting, HOEF continued to ask the purported 14 year old what she would be wearing and what were her sexual boundaries.

13. On Monday, January 18, 2021, HOEF arrived at the planned meeting place at 12:30 PM at a local business in Romulus, Michigan. This was the time and location discussed in the KIK chats with the OCE. Following the rendezvous at the business, HOEF and the OCE had arranged to go to HOEF's residence to engage in the sexual encounter. HOEF was approached by law enforcement and, following the waiver of his *Miranda* rights, agreed to speak with investigators. HOEF confirmed his KIK account was SaltyTripod and that he lived alone in his residence of 2xxxx Hazelwood, Hazel Park, Michigan, up until the previous Saturday when a new roommate had moved in. HOEF admitted to setting up a meeting to have sex with a girl he met online but told investigators he did not know the girl was under the age of 18. HOEF alleged that he believed her purported age of 14 was part of the role-playing activity.

14. Based on the factors leading up to the meeting, and the context of the chats, it is believed HOEF knew the age of the purported girl he was meeting to be 14 years of age, and that he planned to have a sexual encounter with her. Not only did the OCE identify themselves as 14 years old, but frequently the chats would discuss having school, dealing with a mother who would take her phone away, and doing Algebra 1 homework. Based on my training and experience in these types of investigations, it is reasonable to believe HOEF had arranged a sexual encounter with an individual he thought to be under the age of 18.

### III. CONCLUSION

15. Probable cause exists that CHRISTOPHER HOEF violated 18 U.S.C. § 2422(b) online enticement of a minor to engage in sexual activity and 18 U.S.C. § 1470 Transfer of Obscene Matter to a Minor.

Respectfully submitted,



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Eli Bowers, Special Agent  
Federal Bureau of Investigation

Sworn to before me and signed in my  
presence and/or by reliable electronic means.



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HON. DAVID R. GRAND  
UNITED STATES MAGISTRATE JUDGE

Date: January 19, 2021